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Attorney for Lawrence Kalen

UNITED STATES DISTRICT COURT
FOR
THE NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KALEN, GREGGORY SABLAN, KALEN,
LAWRENCE, and SABLAN, MANUEL
ALDAN,

Defendants.

CRIMINAL CASE NO. 08-00014


DEFENDANT LAWRENCE KALEN'S
MOTION FOR MODIFICATION OF BAIL
CONDITIONS

Time: 9:30 a.m.
Date: July 22, 2008
Judge: Munson

Lawrence Kalen, defendant in the above-entitled action, by and through his counsel, Bruce Berline, hereby moves the court, pursuant 18 U.S.C. § 3142 (c)(3), to modify Defendant's conditions of bail.

This motion is made on grounds that Defendant Kalen has an employment opportunity as a security guard; however, his curfew must be modified in order for him to work. Accordingly, Defendant Kalen requests that his curfew, presently set between the hours of 6 p.m. to 6 a.m., be reduced to include only the hours between 3 a.m. and 6 a.m.

Dated this 18th day of July, 2008.


BRUCE BERLINE
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